

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

**TRACY CLARE MICKS-HARM,**  
(and other related Plaintiffs)

Lead Case No. 18-12634

Hon. Denise Page Hood  
Magistrate R. Steven Whalen

Plaintiff,

vs.

**WILLIAM PAUL NICHOLS ET AL.,**

Defendants.

Consolidated with Case Nos.  
18-13206, 18-13639, 18-13647  
19-10125, 19-10126, 19-10132  
19-10135, 19-10299, 19-10648  
19-10785, 19-10639, 19-10661  
19-10649

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**DEFENDANT IPATIENTCARE INC.'S CONCURRENCE WITH ALL  
OTHER ARGUMENTS IN SUPPORT OF MOTIONS TO DISMISS FILED  
BY OTHER DEFENDANTS**

NOW COMES Defendant, IPATIENTCARE INC. (“**IPC**”), by and through  
its legal counsel, Robert S. Iwrey Esq. and James R. Witham Esq., of THE HEALTH  
LAW PARTNERS, P.C., and states as follows:

In order to reduce duplicative briefings, to the extent applicable and not  
inconsistent with any argument made by IPC, IPC adopts and incorporates by reference

all arguments raised by other Defendants in this case in support of the dismissal of all Plaintiffs' Complaints.

For the foregoing reasons, IPC respectfully requests that this Court grant IPC's Motion to Dismiss, dismiss (current and future related) Plaintiffs' claims against IPC with prejudice, and award costs and fees incurred by IPC as a result of these frivolous actions.

Dated: April 4, 2019

Respectfully submitted,

THE HEALTH LAW PARTNERS, P.C.

By: /s/ James R. Witham

Robert S. Iwrey (P48688)

James R. Witham (P79270)

*Attorneys for Defendant iPatientCare Inc.*

32000 Northwestern Highway, Suite 240

Farmington Hills, MI 48334

Tel: (248) 996-8510

Fax: (248) 996-8525

riwrey@thehelp.com

jwitham@thehelp.com

**CERTIFICATE OF SERVICE**

I hereby certify that on April 4, 2019, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system, which will notify all counsel of record. I further certify that I have served the following foregoing paper via US mail on the following non-ECF participants:

Tracy Clare Micks-Harm  
Plaintiff Pro Per  
1840 Bayview Dr.  
Monroe, MI 48161

Renay Blakesley  
Plaintiff Pro Per  
6298 Suder Ave.  
Erie, MI 48133

Raymond Blakesley  
Plaintiff Pro Per  
6298 Suder Ave.  
Erie, MI 48133  
Tel: 734-347-3393

Debra A. Nichols  
401 W. 4th St.  
Monroe, MI 48161

Ines Helm  
Plaintiff Pro Per  
1666 N. Raisinville Rd.  
Monroe, MI 48162

Dennis Helm  
Plaintiff Pro Per  
1666 N. Raisinville Rd.  
Monroe, MI 48162

Eric Cook

Plaintiff Pro Per  
920 Greenwood, Apt. E.  
Monroe, MI 48162

Eric Cook  
*for Jacob Cook*  
920 Greenwood Apt E.  
Monroe, MI 48162

Eric Cook  
Plaintiff Pro Per  
920 Greenwood, Apt. E.  
Monroe, MI 48162

Janet Berry  
Plaintiff Pro Per  
800 West 7th Street  
Apt. 807  
Monroe, MI 48161

Tammy Clark, for  
Richard Johnson  
Plaintiff Pro Per  
6154 Douglas Road  
Toledo, OH 43613

Donna Knierim  
Plaintiff Pro Per  
12767 Helen  
Southgate, MI 48195

Angela Mills  
Plaintiff Pro Per  
2697 Hasen Drive  
Lamberville, MI 48144

THE HEALTH LAW PARTNERS, P.C. - 32000 NORTHWESTERN HWY., STE. 240 - FARMINGTON HILLS, MI 48334 - (248) 996-8510

/s/Sabina Cucu  
Sabina Cucu  
Executive Assistant  
The Health Law Partners, P.C.  
32000 Northwestern Highway, Suite 240  
Farmington Hills, MI 48334  
(248) 996-8510

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